



CONNECTICUT RECREATION AND PARKS ASSOCIATION



Testimony of the

Connecticut Recreation & Parks Association Connecticut Association of Schools / Connecticut Interscholastic Athletic Association Connecticut Parks Association

**Before The Legislature's Environment Committee
February 19, 2014**

Re: SB 68 AAC AUTHORIZING THE USE OF CERTAIN MICROBIAL AND BIOCHEMICAL PESTICIDES AND GRUB CONTROL PRODUCTS ON SCHOOL GROUNDS

The **Connecticut Recreation and Park Association (CRPA)** represents more than 600 individual professionals from municipal, nonprofit and private, park, recreation & camp organizations, as well as 128 municipal park and recreation departments in Connecticut. The **Connecticut Association of Schools / Connecticut Interscholastic Athletic Association (CAS/CIAC)** represents more than 1,000 public and parochial elementary, middle and high schools as well as the technical high schools. The principals of those schools represent the schools. The **Connecticut Parks Association (CPA)** represents the operators of nearly 160 parks in Connecticut.

Collectively, these organizations are directly responsible for the safe and effective maintenance and operation of virtually all school and public recreational fields and areas in Connecticut. They are non-profit public servants and have no financial interest in the sale of any product used to maintain such fields and athletic areas. They know what works and what is safe.

The Organizations believe that although the intent of SB 68 appears to be to allow them to safely and effectively maintain such recreational areas, the bill is so seriously flawed and they cannot support it at this time. SB 68 attempts to legislate the use of a particular product and fails to acknowledge that science is rapidly evolving. CRPA, CAS/CIAC and CPA recommend that permitted usage be based on a product's toxicity rating rather than whether it contains an EPA caution label.

The Organizations agree that more flexibility is needed to determine which products can be used to maintain fields. Since implementing the ban on the use of integrated pest management on K-8 fields many members have seen their fields deteriorate. SB 68 is an attempt at a partial solution to this problem. Unfortunately, a comprehensive solution is needed and this bill only confuses an already challenging situation.

SB 68 recognizes that certain low toxicity products must be allowed to combat grubs, particularly since so called organic products are ineffective to combat grubs and neither preserve our fields and do not always protect the public. Furthermore, as written, SB 68 would appear to only allow one product: Acelepryn, to be used based on the fact that it does not have an EPA caution label containing such "signal" words.

This is troubling for several reasons, not the least of which is that, as science evolves and more products become available, Connecticut must be able in a timely fashion to permit the use of more effective and less toxic products, again whether synthetic or organic. This area requires the science based expertise of our regulatory agencies. Timely evaluation of the toxicity and effectiveness of both synthetic or organic products is, with all respect, not within the Legislature's expertise. And, even if the EPA does not mandate a caution label on a product, a manufacturer can ask the EPA for a caution label, thereby rendering a safe product unusable in Connecticut.

SB 68 is further flawed in that it references “horticultural soap” as an exemption to the ban if it does not contain “any synthetic pesticide or synergist”. If this is the same product as an insecticidal soap than no product will fit this description as every insecticidal soap is synthetic.

Further, SB 68 references “microbial pesticides”; according to professionals among our members they are unaware of any commercially available that are effective in turf management.



In summary, SB 68 is fatally flawed. It is neither safe nor effective. It fails to address the need for effective products to deal with more than grubs, such as various invasives and such common problems as poison ivy. The concept of trying to legislate the use of a particular product makes little sense if science is to form the foundation for protecting the public.

The unintended consequences of SB 68 are not in the public interest. Therefore the CRPA, CAS/CIAC and the CPA collectively and individually ask that you do not favorably report SB 68.

It is my privilege to offer this testimony on behalf of all three above referenced organizations.

Paul J. Roche,
Chairman of the Legislative Committee for the
Connecticut Recreation & Parks Association



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